

**PART 70 OPERATING PERMIT  
OFFICE OF AIR MANAGEMENT  
and Anderson Office of Air Management**

**Delphi Automotive Systems, L.L.C.  
2900 South Scatterfield Rd.  
Anderson, IN 46013**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T095-6388-00016	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and the Anderson Office of Air Management (AOAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a automobile parts manufacturing source.

Responsible Official: John Jaffers  
Source Address: 2911 State Road 9, Anderson, IN 46016;  
2900 South Scatterfield Road, Anderson, IN 46013  
2902 State Road 9, Anderson, IN 46016;  
2900 State Road 9, Anderson, IN 46016;  
1820 E. 32<sup>nd</sup> Street, Anderson, IN 46016;  
2620 E. 38<sup>th</sup> Street, Anderson, IN 46016.  
Mailing Address: 5725 Delphi Drive, Troy, MI 48098-2815  
SIC Code: 3714  
County Location: Madison  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) natural gas-fired boiler (C), installed in 1973, identified as EU 20-1, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11EA48.
- (2) One (1) natural gas-fired boiler (d), installed in 1973, identified as EU 20-2, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11NA48.
- (3) Varnish operations consisting of the following:
  - (a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.
  - (b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.
  - (c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.

- (d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.
- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2000 pounds per hour, with no controls and exhausting to stack L36EA21.
- (5) Two (2) engine dynamometers used for research and development.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.
- (2) Equipment powered by internal combustion engines of less than 500,000 Btu per hour capacity, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour.
- (3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.
- (4) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.
- (5) Storage tanks less than one thousand (1,000) gallons in capacity with annual throughputs less than twelve thousand (12,000) gallons.
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary coatings.
- (8) Machining where an aqueous cutting coolant continuously floods the machine interface.
- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as having a vapor pressure of less than 0.7kPa; 5 mmHg or 1 psi measured at 20 degrees C (88 degrees F).
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Rolling oil recovery systems.

- (14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
- (15) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (16) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (17) Quenching operations used with heat treating processes.
- (18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (19) Heat exchanger cleaning and repair.
- (20) Trimmers that do not produce fugitive emissions and are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (21) Paved and unpaved roads and parking lots with public access.
- (22) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (23) Asbestos abatement projects regulated by 326 IAC 14-10.
- (24) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions for those activities would not be associated with any production processes.
- (25) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (26) Blowdown for any of the following: sight glass; boiler, compressors; pumps and cooling towers.
- (27) Furnaces used for melting metals other than beryllium with a brim full capacity of less than 460 cubic inches by volume.
- (28) On-site fire and emergency response training approved by the department.
- (29) Diesel generators not exceeding 1800 horsepower.
- (30) Stationary fire pumps.
- (31) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (32) Filter or coalescer media changeout.

- (33) Mold release agents using low volatile products (vapor pressure less than 2 kilopascals measured at 38 degrees C).
- (34) A laboratory as defined in 326 IAC 2-7-1 (21)(C).
- (35) Rust prevention (Acrylic acid, methyl ethyl ketone).
- (36) Other activities listed below:

Adhesive application	Enamel touch up	Re-op operation
Adhesive, hot melt	Epoxy dispenser	Repair hood
Assembly, black shell	Feeders	Rust inhibitors
Atomized aluminum powder	Filter cooling system	Sanders
Banders	Flux application	Saws, cut-off and band
Battery formation	Foaming station	Sharpeners, drill & hob
Battery test cabinets	Furnaces	Silicone coating
Blander	Glue and ink operations	Spray booth
Blasting, band, sand & steel	Glue degassing	Straightener
Broach machines, gear cutters	Glue dispensers	Sylgard dials
Buffing wheel	Lubricate seals	Test station
Chuckers	Machine aluminum molds	Thermotron units
Cleaning, ink stamp	Machining operations	Trimmer
Cleanup; general	Magnaflux	Urethane mixing station
Coil removal	Magnet assembly	Vacuum furnace
Cold boxes	Mixing station	Varnish dip
Conductive ink	Mixing tanks	Varnish strip
Cure handlers	Molding material silos	Vibration chambers
Cut-out dials, final	Molding presses	Vulcan machine
Date code stamp	Molding, plastic injection	Washer, parts
Dielectric test	Oil/water separator	Washer, rust inhibitor
Dip booth	Ovens, gas and electric	Weigh station
Dip tanks	Oven, hydrogen	Winding machines, wire
Dryer, gas-fired	Oven, thermal shock	Wire brush
Deburring	Oven, vapor-phase	Wire stripping
Electrical discharge machines	Ovens, potting	Wood shop
	Presses, punch	

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B GENERAL CONDITIONS**

### **B.1 Permit No Defense [IC 13]**

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### **B.2 Definitions [326 IAC 2-7-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3 Permit Term [326 IAC 2-7-5(2)]**

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### **B.4 Enforceability [326 IAC 2-7-7(a)]**

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and AOAM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.
- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the AOAM.

### **B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### **B.6 Severability [326 IAC 2-7-5(5)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]**

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:



Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (b) The Permittee shall furnish to IDEM, OAM, and the AOAM within a reasonable time, any information that IDEM, OAM, and the AOAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and the AOAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and the AOAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and the AOAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and the AOAM upon request and shall be subject to review and approval by IDEM, OAM, and the AOAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and the AOAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967  
Telephone Number: 317-646-9835 (AOAM)  
Facsimile Number: 317-646-9657 (AOAM)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and the AOAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and the AOAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
  - (1) The applicable requirements are included and specifically identified in this permit; or
  - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and the AOAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and the AOAM has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and the AOAM has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and the AOAM determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and the AOAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and the AOAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and the AOAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and the AOAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.

- (2) If IDEM, OAM, and the AOAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.



- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and the AOAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and the AOAM, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAM, and the AOAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and the AOAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and the AOAM U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and the AOAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and the AOAM nor an authorized representative, may disclose the information unless and until IDEM, OAM, and the AOAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAM, and the AOAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and the AOAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM or AOAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]

The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.

## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of volatile organic compounds and other criteria pollutants are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit of volatile organic compounds or any other criteria pollutant to 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.

#### C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

#### C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six minute averaging period, as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

#### C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

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All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-7-6(1)]**

#### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) If required, testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) If IDEM, OAM requires modification to the test methods, analytical methods, operational parameters or other matters included in the test protocol the source operator and the testing firm shall be notified by letter or telephone at least twenty-one (21) days prior to the proposed test date. If the source operator or test firm desires to change any previously submitted procedures or conditions, IDEM, OAM shall be notified of such change as soon as practicable prior to the test. Reasonable changes in the test protocol that result from emergency conditions during the test shall be approved by IDEM, OAM before the test may proceed if a department staff person is available at the test site. Otherwise, post-test approval may be granted based on reasonable changes resulting from emergency or reasonably unforeseeable conditions during the test.



- (c) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend the compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

##### **C.12 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

#### **C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on July 10, 1998.
- (b) If the ERP is disapproved by IDEM, OAM, and the AOAM, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, and the AOAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### **C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) A verification to IDEM, OAM, and the AOAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and the AOAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.

C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and the AOAM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, and the AOAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
- (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## **SECTION D.1 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

- (1) One (1) natural gas-fired boiler (C), installed in 1973, identified as EU 20-1, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11EA48.
- (2) One (1) natural gas-fired boiler (D), installed in 1973, identified as EU 20-2, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11NA48.

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.1.1 Particulate Matter (PM) [326 IAC 6-2-3]**

Pursuant to 326 IAC 6-2-3 (Particulate Matter Emission Limitations for Sources of Indirect Heating), the PM emissions from each of the two boilers identified as 20-1 and 20-2 boilers, shall be limited to 0.6 pounds per MMBtu heat input.

### **Compliance Determination Requirements**

#### **D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.3 Natural Gas Fired Boiler Certification**

The natural gas fired boiler certification located at the end of this permit shall be submitted to the address listed in Section C - General Reporting Requirements, within thirty (30) days after the end of the quarter being reported.

## SECTION D.2 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (3) Varnish operations consisting of the following:
  - (a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.
  - (b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.
  - (c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.
  - (d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.
- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 2,000 pounds per hour, with no controls and exhausting to stack L36EA21.
- (5) Two (2) engine dynamometers used for research and development.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8]

Based on the date of construction, pre 1973, there are no Article 8 rules that apply to the varnish operations or double drum parts washer.

#### D.2.2 Nitrogen Oxide Compounds (NOx)

The input of gasoline to the two (2) dynamometers shall be limited to 7500 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

### Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.2.3 Record Keeping Requirements

- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.2.2.
  - (1) The total gasoline usage in gallons for each month;
  - (2) A log of the dates of use;
  - (3) Monthly emissions in tons of NOx.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and Anderson Office of Air Management**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems  
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013  
Mailing Address: P.O. Box 2439, Anderson, IN 46018  
Part 70 Permit No.: T095-6388-00016

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) \_\_\_\_\_

9 Report (specify) \_\_\_\_\_

9 Notification (specify) \_\_\_\_\_

9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967  
and  
Anderson Office of Air Management  
PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems  
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013  
Mailing Address: P.O. Box 2439, Anderson, IN 46018  
Part 70 Permit No.: T095-6388-00016

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
<b>9</b>	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
<b>9</b>	2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR MANAGEMENT**  
**COMPLIANCE DATA SECTION**  
and Anderson Office of Air Management

**PART 70 OPERATING PERMIT**  
**NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems  
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013  
Mailing Address: P.O. Box 2439, Anderson, IN 46018  
Part 70 Permit No.: T095-6388-00016

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this permit.**

Report period

Beginning: \_\_\_\_\_

Ending: \_\_\_\_\_

Boiler Affected

Alternate Fuel

Days burning alternate fuel  
From                      To


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION  
and Anderson Office of Air Management**

**PART 70 OPERATING PERMIT  
SEMI-ANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Delphi Automotive Systems, L.L.C., Energy and Engine Management Systems  
Source Address: 2900 South Scatterfield Road, Anderson, IN 46013  
Mailing Address: P.O. Box 2439, Anderson, IN 46018  
Part 70 Permit No.: T095-6388-00016

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b>	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

# Indiana Department of Environmental Management Office of Air Management

## Addendum to the Technical Support Document for Part 70 Operating Permit

<b>Source Name:</b>	Delphi Automotive Systems, L.L.C.
<b>Source Location:</b>	2911 State Road 9, Anderson, IN 46016; 2900 South Scatterfield Road, Anderson, IN 46013; 2902 State Road 9, Anderson, IN 46016; 2900 State Road 9, Anderson, IN 46016; 1820 East 32 <sup>nd</sup> Street, Anderson, IN 46016; 2620 East 38 <sup>th</sup> Street, Anderson, IN 46016
<b>County:</b>	Madison
<b>SIC Code:</b>	3714
<b>Operation Permit No.:</b>	T095-6388-00016
<b>Permit Reviewer:</b>	J. Patterson /FLL

On October 22, 1998, the Office of Air Management (OAM) had a notice published in the Anderson Herald newspaper, Anderson, Indiana, stating that Delphi Automotive Systems, L.L.C. had applied for a Part 70 Operating Permit to operate an automobile parts manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On November 24, 1998 and January 19, 1999, Delphi Automotive Systems, L.L.C. submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows:

### Comment 1:

Delphi is currently in the process of becoming a fully independent, publicly-traded company. The transaction is expected to result in the transfer of Delphi division assets to the newly formed Delphi Automotive Systems, L.L.C. by the beginning of 1999. The mode of operation, personnel, contact people, and the address of the Delphi Energy and Engine Management Systems, Anderson Facilities are expected to remain unchanged. The owner of the facility should be changed to Delphi Automotive Systems, L.L.C.

### Response to Comment 1:

The source name on the cover page, header and all reporting forms has been changed to reflect the new name.

### Comment 2:

Delphi had previously notified IDEM that the responsible official had changed from Stanley P. Owens to Stephen A. Gudgel. But according to a letter received by IDEM, OAM on February 5, 1999 (resulting in Administrative Amendment A067-10604-00061) the responsible official should be John A. Jaffers. The Administrative Amendment also showed a change in mailing address, which should be 5725 Delphi Drive, Troy, MI 48098-2815. Update records to reflect the change in responsible official and mailing address.

**This change has been made.** All future correspondence shall be addressed to the correct responsible official and sent to the correct mailing address.

Delphi believes that the two dynamometers that are used for research and development, which are currently listed as insignificant activities in Condition A.3(2) - Specifically Regulated Insignificant Activities, **should instead be listed as significant emission units in Condition A.2 - Emission Units and Pollution Control Equipment.** The potential to emit from these two dynamometers (without usage restrictions) exceeds the insignificant levels listed in 326 IAC 2-1-1. **A condition should also be added in Section D to limit the gasoline usage from the dynamometers to 7500 gallons per year, based on a 12 month rolling average.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

- The following has been added to Condition A.2 - Emission Units and Pollution Control Equipment Summary, and in the facility description box in Section D.2:

- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

(5) Two (2) engine dynamometers used for research and development.

## Facility Description [326 IAC 2-7-5(15)]

- (5) Two (2) engine dynamometers used for research and development.

### D.2.2 Nitrogen Oxide Compounds (NO<sub>x</sub>)

The input of gasoline to the two (2) dynamometers shall be limited to 7500 gallons per twelve (12) consecutive month period, rolled on a monthly basis.

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**D.2.3 Record Keeping Requirements**

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- (a) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken monthly and shall be complete and sufficient to establish compliance with the NOx usage limits and the Nox emission limits established in Condition D.2.2.
- (1) The total gasoline usage in gallons for each month;
- (2) A log of the dates of use;
- (3) Monthly emissions in tons of NOx.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**Comment 4:**

In Condition A.2(4) - Emission Units and Pollution Control Equipment Summary, the capacity listed for the double drum parts washer is incorrect. **The maximum capacity should be 2000 pounds per hour.**

**Response to Comment 4:**

**Condition A.2(4) - Emission Units and Pollution Control Equipment Summary has been changed to be as follows:**

**A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]**

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- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of ~~200~~ **2000** pounds per hour, with no controls and exhausting to stack L36EA21.

**Comment 5:**

In Condition B.1 - Permit No Defense, the first sentence has no relation to condition title and is not supported by any applicable requirement. Separation of this sentence from the portion of 326 IAC 2-1-10 cited in B.1(a) is confusing. **Change Condition B.1 to:**

**B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]**

---

- (a) ~~Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 Permit under 326 IAC 2-7.~~
- (b) ~~This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield".~~

*The issuance or possession of any permit shall not alone constitute a defense against an alleged violation of any law, regulation, or standard. This prohibition shall not apply alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15.*



### Response to Comment 5:

The first sentence of Condition B.1 - Permit No Defense does relate to the title. The Permittee is responsible for complying with new applicable rules enacted after the permit is issued. The permit is not a defense for any failure to comply with new requirements. **The rule cite for 326 IAC 2-1-10 has been removed as well as a rule cite in Condition B.1(b). Condition B.1 will now read as follows:**

#### **B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]**

---

- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3.2 or 326 IAC 2-7-15~~, as set out in this permit in the Section B condition entitled "Permit Shield".

### Comment 6:

In Condition B.8 (a), (b) and (c) - Duty to Supplement and Provide Information, the duty to supplement and provide information regarding the Title V permit application should be submitted to the implementing agency - The Indiana Department of Environmental Management, Office of Air Management (IDEM, OAM). The Anderson Office of Air Management (AOAM) should receive a copy any updates. **Change Condition B.8 as follows:**

#### **B.8 Duty to Supplement and Provide Information ~~[326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]~~**

---

- (a) *The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:*

*Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015*

*and a copy to:*

*Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011*

- (b) *The Permittee shall furnish to IDEM, OAM, ~~and the AOAM~~ within a reasonable time, any information that IDEM, OAM, ~~and the AOAM~~ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.*
- (c) *Upon request, the Permittee shall also furnish to IDEM, OAM, ~~and the AOAM~~ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, ~~and the AOAM~~ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.*

### Response to Comment 6:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

**Comment 7:**

In Condition B.11(a) - Annual Compliance Certification, this condition is unclear as to what terms and conditions (i.e. section B, C and D) in the permit require annual certification. It is Delphi's understanding that the annual compliance certification is applicable to the conditions listed in Section D of the permit. Section A contains a source summary, Section B lists general conditions that may or may not be applicable to the Delphi facility and Section C is also source operation conditions that may or many not be applicable to the processes at the Delphi facility. For example, if the annual compliance certification report is to cover all conditions listed in Sections A, B and C, then the requirements defined in Section B.11(c)(1-6) for compliance certification would not be applicable for all of the conditions listed in section A through C.

The submission requirement to the United States Environmental Protection Agency Region should be removed. A copy of the certification report will be submitted to the AOAM. Redundant submission to multiple agencies is unnecessary and burdensome. IDEM, OAM should be the consistent recipient throughout the permit.

In Condition B.11(b) - Annual Compliance Certification, the timeliness determination should be made by the implementing agency - IDEM, OAM.

**Change Condition B.11 as follows:**

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

- (a) *The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices listed in Section D of this permit. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:*

*Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015*

*and a copy to:*

*Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011*

*and*

~~*United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590*~~

- (b) *The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.*

### Response to Comment 7:

The Permittee must certify compliance with all applicable requirements in Sections A, B, C, D.1 and D.2. If some conditions in Sections B or C are not applicable, the Permittee shall state in the certification that these requirements were not applicable to this source at this time.

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

There will be no changes to this condition in the final permit due to this comment.

### Comment 8:

In Condition B.12 (a) and (c) - Preventive Maintenance Plan, a copy of the preventive maintenance plan (PMP) will be sent to AOAM. Preventive Maintenance Plans should be submitted to and approved by the implementing agency - IDEM, OAM. Redundant submissions to and approvals from multiple agencies is unnecessary and burdensome. IDEM, OAM should be the consistent recipient throughout the permit. Revise the condition to indicate that a copy of the PMP will be sent to the Anderson Office of Air Management. **Change Condition B.12 as follows:**

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]  
(a)

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*If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:*

*Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015*

**and a copy to:**

*Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011*

(b)  
(c) PMP's shall be submitted to IDEM, OAM, ~~and the AOAM~~ upon request and shall be subject to review and approval by IDEM, OAM, ~~and the AOAM~~.

### Response to Comment 8:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

**Comment 9:**

Regarding Condition B.13 - Emergency Provisions,

In Condition B.13(b)(4) and (5), and (f), the submission requirements to the Anderson Office of Air Management should be removed. 326 IAC 2-7-16 requires that the "commissioner" be notified. The commissioner should be identified as the IDEM, OAM. Redundant submissions to multiple agencies is unnecessary and burdensome. IDEM, OAM should be the consistent recipient throughout the permit.

Condition B.13(d) is confusing. The condition states that the emergency provisions supersedes 326 IAC 1-6 (Malfunction) provisions, but it also states that this condition is in addition to any upset provision contained in any applicable requirement. The condition needs to clarify that the requirements listed in the Malfunctions provisions (326 IAC 1-6) are not applicable if the requirements under the emergency provision (326 IAC 2-7-16) have been met.

**Change Condition B.13 as follows:**

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (b)
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, ~~and the AOAM~~ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

~~Telephone Number: 317-646-9835 (AOAM)~~  
~~Facsimile Number: 317-646-9657 (AOAM)~~

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

~~and~~

~~Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011~~

- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. ~~This permit condition is in addition to any emergency or upset provision contained in any applicable requirement. The requirements listed in the Malfunctions provisions (326 IAC 1-6) are not applicable if the requirements under the emergency provision (236 2-7-16) have been met.~~
- (f) Failure to notify IDEM, OAM, ~~and the AOAM~~ by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

### Response to Comment 9:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

The Malfunction provisions in 326 IAC 1-6 are not applicable to this source because the requirements of Emergency Provisions 326 IAC 2-7-16 supersedes those requirements. There may be some other requirements applicable to this source that have their own separate emergency provisions. These requirements in Condition B.13 "Emergency Provisions" will not supersede these other requirements.

There will be no changes to this condition in the final permit due to this comment.

### Comment 10:

In Condition B.14 (g) and (h) - Permit Shield, the requirement to have IDEM, OAM and AOAM issue modifications to the Title V permit is redundant. The implementing agency - IDEM, OAM should be responsible for issuing modifications to the Title V permit. **Change Condition B.14 (g) and (h) as follows:**

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (g) *This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, ~~and the AOAM~~ has issued the modifications. [326 IAC 2-7-12(c)(7)]*
- (h) *This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, ~~and the AOAM~~ has issued the modification. [326 IAC 2-7-12(b)(8)]*

### Response to Comment 10:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

### Comment 11:

In Condition B.16 (a) - Deviations from Permit Requirements and Conditions, the requirement to notify IDEM, OAM of deviations from permit requirements and conditions within 10 calendar days of discovery is unnecessarily restrictive and is not supported by the regulation cited. A provision requiring notification within 30 days, consistent with other reporting provisions, e.g. C14(a), is sufficiently protective of human health and the environment. AOAM will be sent copies of deviation reports. The discussion of emergencies in this paragraph is unclear. **Change Condition B.16(a) as follows:**

**B.16** Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) ~~Deviations from any permit requirements~~ **other than emergency circumstances** (for emergencies see Section B.13 - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and a copy to:

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

within **thirty (30)** ~~ten (10)~~ calendar days from the date of the discovery of the deviation.

**Response to Comment 11:**

326 IAC 2-7-5(3)(c)(i) sets out the requirement of reporting required monitoring at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including all the information required in each deviation report. OAM maintains that reporting deviations every six months is not adequate to ensure that the cause of any reoccurring deviation is corrected in a timely fashion. Ten days has been determined to be a reasonable amount of time to report non-emergency deviations, rather than the shorter reporting times required by the Emergency Provisions. The use of alternate reporting periods is authorized pursuant to 326 IAC 2-7-6(6) (Compliance Requirements) which states "Such other provisions as the commissioner may require", and pursuant to IC 13-14-1-13 which gives the Commissioner authority to establish monitoring and reporting requirements.

In addition, the source should be aware that six months is not the only deviation reporting time period required by 326 IAC 2-7-5(3)(C) (Permit Content). 326 IAC 2-7-5(3)(C)(ii) states "Notwithstanding requirements in this section, the reporting of deviations required by an applicable requirement shall follow the schedule stated in that applicable requirement." 326 IAC 2-7-16(b)(4) (Emergency Provision) requires notification within four (4) daytime business hours after the beginning or discovery of an emergency, and 326 IAC 2-7-16(b)(5) requires the submittal of a faxed or written notice within 2 working days of the time when emission limitations were exceeded due to the emergency.

In order to minimize errors, IDEM, OAM has decided not to specify numbers in conditions to refer to other condition, because the condition numbers can change with any modification to the permit. The table of contents at the beginning of the permit will allow the reader to easily find the indicated condition.

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

There will be no changes to this condition in the final permit due to this comment

**Comment 12:**

In Condition B.17(c) and (d) - Permit Modification, Reopening, Revocation and Reissuance, or Termination, Delphi agrees that IDEM, OAM or AOAM can determine if the permit should be opened or revised under any of the circumstances listed in IC 13-15-7-2 or the conditions listed in Section B.17(b) of this draft permit. Condition (c) and (d) require both IDEM, OAM and AOAM to follow the same procedures to reopen the permit. The way this condition is worded, it implies that two (2) Title V permits would be issued. One from IDEM, OAM and another one from AOAM. Only one (1) Title V permit should be issued and IDEM, OAM should be the agency responsible for issuing the Title V permit.

**Change Condition B.17 (c) and (d) as follows:**

*B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]*

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- (c) Proceedings by IDEM, OAM, ~~and the AOAM~~ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]*
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, ~~and the AOAM~~ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, ~~and the AOAM~~ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]*

**Response to Comment 12:**

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

**Comment 13:**

In Condition B.18(a), submission of the renewal application to two (2) agencies is redundant.

Condition B.18(b) indicates that both IDEM, OAM and AOAM are responsible for determining if the renewal application is timely and for issuing or denying the permit renewal. A copy of the renewal application can be sent to AOAM, but IDEM, OAM should be the only agency responsible for determining timeliness of the renewal application and issuing or denying the permit renewal.

In Condition B.18(c), IDEM, OAM should be the only agency taking final action on the renewal application.

In Condition B.18(d), AOAM should not be required to act in a timely way on a Part 70 renewal application.

**Change Condition B.18 as follows:**



**B.18 Permit Renewal [326 IAC 2-7-4]**

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, ~~and the AOAM~~ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and a copy to:

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, ~~and the AOAM~~ on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAM, ~~and the AOAM~~, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, ~~and the AOAM~~, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, ~~and the AOAM~~, any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]

If IDEM, OAM, ~~and the AOAM~~, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**Response to Comment 13:**

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. An action by either agency will indicate if that action is on behalf of both agencies. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

There will be no changes to this condition in the final permit due to this comment.



**Comment 14:**

In Condition B.22 - Operational Flexibility, the notification requirements to the United States Environmental Protection Agency Region V should be removed. Notification requirements for changes at the source that are in accordance with 326 IAC 2-7-20 (b), (c), or (e) should be submitted to the implementing agency – The Indiana Department of Environmental Management. Redundant submissions to multiple agencies is unnecessary and burdensome. IDEM, OAM should be the consistent recipient throughout the permit. Copies of the change notifications will be sent to AOAM.

**Change Condition B.22 as follows:**

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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(a)

(4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and a copy to:

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

~~and~~

~~United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch – Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590~~

~~in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and~~

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

~~Such records shall consist of all information required to be submitted to IDEM, OAM, and the AOAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).~~

**Response to Comment 14:**

Pursuant to 326 IAC 2-7-20 (Operational Flexibility), the owner or operator of a source must make notification to the U.S. EPA in advance of any changes.

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

#### Comment 15:

In Condition B.26 - Annual Fee Payment, the consequences of failure to pay fees described in B.26(b) are not supported by the regulations cited. **Change Condition B.26 as follows:**

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

(a) ~~The Permittee shall pay annual fees to IDEM, OAM, and the AOAM, within thirty (30) calendar days of receipt of a billing in a time period consistent with the fee schedules established in 326 IAC 2-7-19 and applicable local regulations. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.~~

~~(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.~~

#### Response to Comment 15:

Pursuant to 326 IAC 2-7-19(b) (Fees), the applicable fee is due April 1 of each year. Pursuant to 326 IAC 2-1-7.1(b) (Fees for Registration, Construction Permits, and Operating Permits), nonpayment of fees shall result in revocation of the permit. Therefore, IDEM, OAM has this authority. **There will be no changes to this condition in the final permit due to this comment.**

#### Comment 16:

Condition B.28 - Credible Evidence is based on EPA's credible evidence regulation which is being challenged because it changes the compliance obligations under the Clean Air Act, without meeting the mandated procedural requirements. We believe that this concept is especially important under the SIP, which contains rules that were originally promulgated by the State and approved by the USEPA. The intent of the State in adopting these rules and associated test methods was that the compliance methods be the measure of compliance with the standards. Introducing a credible evidence provision authored by EPA, without consideration of Indiana's individual SIP standards is inconsistent with the SIP standards' original scope. **Change Condition B.28 as follows:**

**B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]**

*Compliance with this permit shall be determined through the use of compliance or reference method tests listed from the applicable requirements in this permit and any other credible evidence (which may consist of Title V periodic monitoring methods specified in this permit) or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Such other evidence or information may be used to determine compliance with this permit only if it (1) quantifies the same physical attributes as are quantified by the applicable performance or compliance test or method and (2) averages such quantification over the same time period as the applicable performance or compliance test or method.*

*If the Credible Evidence Rule, promulgated at 62 Fed. Reg. 8314 (Feb. 24, 1997), is invalidated by any court of competent jurisdiction, the credible evidence provisions in this permit shall be deemed automatically null and void.*

#### Response to Comment 16:

IDEM, OAM now believes that this condition is not necessary and has removed it from the final permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit. **Condition B.28 has been deleted from the final permit as follows:**

~~B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

**Comment 17:**

In Section C, previous draft copies of the permit contained the following condition (Condition C.1):

PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

*The total source potential to emit of volatile organic compounds are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.*

This condition should be included in Section C.

**Response to Comment 17:**

IDEM, OAM has added this condition as per the request of the source. The condition, Condition C.1 - PSD Minor Source Status, shall read as follows and all subsequent conditions as well as the table of contents have been renumbered to reflect this addition:

**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

- (a) The total source potential to emit of volatile organic compounds and other criteria pollutants are less than 250 tons per year. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit of volatile organic compounds or any other criteria pollutant to 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAM before such change may occur.

**Comment 18:**

For Condition C.1 - Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour (now renumbered Condition C.2), there are not any processes at Delphi which fall into this category. Remove this condition.

**Response to Comment 18:**

Some of the insignificant activities listed in Condition A.3 - Specifically Regulated Insignificant Activities are subject to the requirements of this condition. Also, future insignificant activities added to the source that would not require prior permit modification or approval from IDEM, OAM may be subject to this requirement. There will be no changes to this condition in the final permit due to this comment.

**Comment 19:**

In Condition C.2 - Opacity, the methods described in 326 IAC 5-1-4 are not USEPA approved test methods for determining compliance with opacity limits. The requirements of a "qualified observer" are not defined. Also, the frequency for which these observations need to be made is not specified. To demonstrate how impractical this rule is, in order for a company to certify compliance with condition (b), a person would have to look at every stack that was associated with a process for six hours. Also, since the frequency is not specified on how often this observation has to be made, it could be interpreted that these observations would have to be made on a daily basis.

C.2 (b) reads as follows: *Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.*

Delphi proposes to meet with IDEM to discuss acceptable ways to certify compliance with this condition.

#### Response to Comment 19:

Certifying compliance with this condition, as well as all conditions in the permit, is done to the best of the source's knowledge. A Permittee may use the information gathered through the compliance determination or compliance monitoring provisions of the permit, the results of inspections performed by regulatory agencies, any observation of an event that indicates that an emission unit may not be operating properly, or other information that the permit has available. In this case, the Permittee is not specifically required to perform a demonstration of compliance with this condition and is not expected to do so to support the compliance certification. The Permittee may rely on more general information when certifying compliance with this condition. If the source certifies compliance, after notified, only then will it be submitting a false certification. **Condition C.2 (now renumbered Condition C.3) - Opacity has been changed to be as follows:**

#### C.23 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of forty percent (40%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~ **any one (1) six minute averaging period**, as determined in 326 IAC 5-1-4.
- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.

#### Comment 20:

For Condition C.8(a) - Performance Testing, there is no testing currently required. Also, Delphi will send a copy of the test protocol to the AOAM, but any approvals of the test protocol should be made by one agency, IDEM, OAM. The test protocol needs to incorporate an approval process and a change notification process. The following proposed language for C.8(b) should be added and any other remaining conditions renumbered to reflect this change. **Change Condition C.8 as follows:**

#### C.8 Performance Testing [326 IAC 3-6]

- (a) **If required, All** testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

*A test protocol, except as provided elsewhere in this permit, shall be submitted to:*

*Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015*

*and a copy to:*

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) ***If IDEM, OAM requires modification to the test methods, analytical methods, operational parameters or other matters included in the test protocol the source operator and the testing firm shall be notified by letter or telephone at least twenty-one (21) days prior to the proposed test date. If the source operator or test firm desires to change any previously submitted procedures or conditions, IDEM, OAM shall be notified of such change as soon as practicable prior to the test. Reasonable changes in the test protocol that result from emergency conditions during the test shall be approved by IDEM, OAM before the test may proceed if a department staff person is available at the test site. Otherwise, post-test approval may be granted based on reasonable changes resulting from emergency or reasonably unforeseeable conditions during the test.***

- (b)(c) All test reports must be received by IDEM, OAM, within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Response to Comment 20:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

Condition C.8 (now renumbered Condition C.9) - Performance Testing has been changed to be as follows:

#### C.89 Performance Testing [326 IAC 3-6]

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- (a) **If required, All** testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) If IDEM, OAM requires modification to the test methods, analytical methods, operational parameters or other matters included in the test protocol the source operator and the testing firm shall be notified by letter or telephone at least twenty-one (21) days prior to the proposed test date. If the source operator or test firm desires to change any previously submitted procedures or conditions, IDEM, OAM shall be notified of such change as soon as practicable prior to the test. Reasonable changes in the test protocol that result from emergency conditions during the test shall be approved by IDEM, OAM before the test may proceed if a department staff person is available at the test site. Otherwise, post-test approval may be granted based on reasonable changes resulting from emergency or reasonably unforeseeable conditions during the test.

- (b)(c) All test reports must be received by IDEM, OAM, and AOAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### Comment 21:

In Condition C.12 (b) and (e) - Emergency Reduction Plans, approval for the emergency reduction plan (ERP) should be from the implementing agency - IDEM, OAM. Notification to put into effect the actions stipulated in the ERP should come from only one agency, either IDEM, OAM or AOAM. **Change Condition C.12 (b) and (e) as follows:**

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**C.12**     *Emergency Reduction Plans*     [326 IAC 1-5-2] [326 IAC 1-5-3]

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- (b)     *If the ERP is disapproved by IDEM, OAM, ~~and the AOAM~~, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.*
- (e)     *Upon direct notification by IDEM, OAM, ~~and the AOAM~~, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]*

#### Response to Comment 21:

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

**Comment 22:**

In Condition C.13 - Risk Management Plan, the text is not clear. Verification that a Risk Management Plan (RMP) or a revised plan was prepared should only be submitted to IDEM, OAM. Annual certification that the RMP is being properly implemented should only be submitted to IDEM, OAM.

**Change Condition C.13 as follows:**

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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*If a regulated substance, ~~subject to 40 CFR 68~~, listed in 40 CFR 68.130, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:*

- (a) *Submit:*
  - (1) *A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or*
  - (2) *As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and*
  - (3) *A verification to IDEM, OAM, ~~and the AOAM~~ that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.*
- (b) *Provide annual certification to IDEM, OAM, ~~and the AOAM~~ that the Risk Management Plan is being properly implemented.*

*All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).*

**Response to Comment 22:**

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

**The first paragraph of Condition C.13 (now renumbered Condition C.14) has been changed to be as follows:**

**C.134 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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*If a regulated substance, ~~subject to 40 CFR 68~~, listed in 40 CFR 68.130, is present in a process at a source in more than the a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:*



**Comment 23:**

In Condition C.15(a) and (b) - Emission Statement, the requirement to report emissions of other regulated pollutants is not supported by 326 IAC 2-6. It should be indicated that a copy of the emission statement will be sent to AOAM. In Condition C.15(c), the emission statement should be considered timely if it is received by one agency - IDEM, OAM. Although a copy will be sent to AOAM, the timeliness determination should be made by the implementing agency - IDEM, OAM.

**Change Condition C.15 as follows:**

- C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]
- (a) ~~The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:~~ **describe actual pollutant emissions from the source, in compliance with 326 IAC 2-6.**
- ~~(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);~~
- ~~(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.~~
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- and a copy to:
- Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, ~~and the AOAM~~ on or before the date it is due.

**Response to Comment 23:**

The Permittee is required to submit the actual emissions of all criteria pollutants and all other regulated pollutants for the purpose of fee assessment as stated in the Technical Support Document (TSD).

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also.

**There will be no changes to this condition in the final permit due to this comment.**



**Comment 24:**

In Condition C.18(b) and (c) - General Reporting Requirements, timeliness determinations should be made by one agency - IDEM, OAM. A copy of the report will be sent to AOAM. **Change Condition C.18(b) and (c) to be as follows:**

**C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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(a)

(b) *The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:*

*Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015*

*and a copy to:*

*Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011*

(c) *Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.*

**Response to Comment 24:**

Pursuant to 326 IAC 2-7-21 (Local Agencies), a local air pollution control agency may perform some or all of the functions of the Part 70 permit program. The commissioner and such a local air agency shall enter into an enforceable written agreement documenting the local air agency's and the department's relative Part 70 permit program roles and responsibilities.

IDEM, OAM and the Anderson Office of Air Management (AOAM) do have this enforceable written agreement. Therefore, the source is required to submit all information that is submitted to IDEM, OAM to AOAM also. **There will be no changes to this condition in the final permit due to this comment.**

**Comment 25:**

In Condition D.1.2 - Preventive Maintenance Plan, regulations supporting the requirements for preventive maintenance plans, 326 IAC 1-6-3 and 326 IAC 2-7-5(3), explicitly refer only to emission control equipment and monitoring devices. Requirement to prepare a preventive maintenance plan for emission units is not supported by any applicable requirement. This condition should be removed because there is not a control device associated with this equipment. **Remove this condition.**

**Response to Comment 25:**

Pursuant to 326 IAC 2-7-4(c)(9) (Permit Application), confirmation that the source maintains on-site a preventive maintenance plan as described in 326 IAC 1-6-3, must be included in the permit application. Pursuant to 326 IAC 2-7-5(13) (Permit Content), a provision that requires the source to do all of the following must be included in each Part 70 permit:

- (1) Maintain on-site the preventive maintenance plan as required under 326 IAC 2-7-4(c)(9);
- (2) Implement the preventive maintenance plan; and,
- (3) Forward to the department upon request the preventive maintenance plan.

The requirements in 326 IAC 1-6-1 and 326 IAC 1-6-3 specify that the requirement to maintain a Preventive Maintenance Plan is applicable to any facility that is required to obtain a permit under 326 IAC 2-1-2 (Registration) and 326 IAC 2-1-4 (Operating Permits).

Nothing in 326 IAC 1-6-3 (Facility), 2-7-5(3) (All Reasonable Information), 2-7-5(13) (Source), refer to control equipment. The OAM recognizes that for some types of facilities, preventive maintenance has little or no bearing on the ability to remain compliant with the applicable requirements.

The requirement to prepare and maintain a Preventive Maintenance Plan for these boilers has been removed. **Condition D.1.2 has been deleted from the final permit as follows:**

~~D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]~~

~~A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

**The remaining conditions of this section have been renumbered.**

**Comment 26:**

In Section D.2, the maximum capacity for the double drum parts washer is incorrect. The correct capacity is 2000 pounds per hour.

**Change the description to:**

*One (1) double drum parts washer, identified as EU 11-117, with a maximum capacity of **2000** 200, pounds per hour, with no controls and exhausting to stack L36EA21.*

**Response to Comment 26:**

**The equipment listed in Section D.2(4) "FACILITY OPERATION CONDITIONS" has been changed to be as follows:**

- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of ~~200~~ **2000** pounds per hour, with no controls and exhausting to stack L36EA21.

**Comment 27:**

**The following comments were also received regarding the Technical Support Document (TSD):**

In the section entitled, *Unpermitted Emission Units and Pollution Control Equipment*, add the following:  
**Two (2) engine dynamometers used for research and development.**

In the section entitled, *Insignificant Activities*, Remove the two engine dynamometers from item (2). Also there is a typo in the term Btu.

Regarding *Appendix A*, the 12.0 mmBtu/hr boiler has been removed from service. The emission calculations for this boiler should be removed from Appendix A.

### Response to Comment 27:

The comments regarding the two (2) engine dynamometers have been changed in the Title V permit where requested. The emission calculations for the 12.0 mmBtu/hr boiler have been removed from Appendix A in the final permit as requested.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

- (1) On the cover page of the permit, *and Enhanced New Source Review* and the rule cite of *and 326 IAC 2-1-3.2* have been removed.
- (2) In the Table of Contents,
  - (a) The rule cite for Condition B.1 - Permit No Defense [326 IAC 2-1-10] has been removed.
  - (b) Condition B.25 should read **Transfer of Ownership or Operational Control** and the rule cite for 326 IAC 2-1-6 has been deleted.
  - (c) Condition B.27 - Enhanced New Source Review [326 IAC 2] has been replaced with a condition entitled **B.27 - Advanced Source Modification Approval [326 IAC 2-7-5(16)]**.
  - (d) Condition D.1.2 - Testing Requirements has added the rule cite **[326 IAC 2-1.1-11]**.
  - (e) Section D.2 - FACILITY OPERATION CONDITIONS should read **Varnish Dip Tanks, Parts Washer and Two (2) Engine Dynamometers**.
  - (f) **Condition D.2.2 - Nitrogen Oxide Compounds (NOx)** has been added.
  - (g) **Condition D.2.3 - Record Keeping Requirements** has been added.
- (3) In Condition B.1 - Permit No Defense the rule cite of [326 IAC 2-1-10] has been removed and in Condition B.1(b), the rule cite of *326 IAC 2-1-3.2* has been deleted.
- (4) Condition B.10(a) - Certification, should read:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

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- (a) **Where specifically designated by this permit or required by an applicable requirement**, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

- (5) Condition B.13(e) - Emergency Provisions, the rule cite should read:

B.13 Emergency Provisions [326 IAC 2-7-16]

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- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(910) be revised in response to an emergency.

(6) Condition B.14(h) - Permit Shield, the rule cite should read:

B.14 Permit Shield [326 IAC 2-7-15]

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- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and the AOAM has issued the modification. [326 IAC 2-7-12(b)(8)]

(7) Condition B.18(b)(1)(B) - Permit Renewal, should have the rule cite deleted:

B.18 Permit Renewal [326 IAC 2-7-4]

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- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due. ~~[326 IAC 2-5-3]~~

(8) Condition B.25 - Transfer of Ownership or Operation, has been replaced with a new condition called Transfer of Ownership or Operational Control:

B.25 Transfer of Ownership or Operational Control ~~[326 IAC 2-1-6]~~ **[326 IAC 2-7-11]**

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- ~~(a) In the event that ownership of this source is change, the Permittee shall notify IDEM, OAM, Permits Branch and the AOAM, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~

- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

- ~~(c) IDEM, OAM, and AOAM shall reserve the right to issue a new permit.~~

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**and**

**Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011**

**The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

**(9) Condition B.26(a) - Annual Fee Payment should have or AOAM added as follows:**

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAM, and the AOAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM or AOAM the applicable fee is due April 1 of each year.**

**(10) Condition B.27 - Enhanced New Source Review has been replaced with a condition entitled **Condition B.27 - Advanced Source Modification Approval** and should be as follows.**

~~B.27 Enhanced New Source Review [326 IAC 2]~~

**B.27 Advanced Source Modification Approval [326 IAC 2-7-5(16)]**

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~~The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.~~

**The requirements to obtain a source modification approval under 326 IAC 2-7-10.5 or a permit modification under 326 IAC 2-7-12 are satisfied by this permit for the proposed emission units, control equipment or insignificant activities in Sections A.2 and A.3 and such modifications occur only during the term of this permit.**

**(11) Condition C.18 (now renumbered Condition C.19) - General Reporting Requirements, has been revised as follows:**

**C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:**

**Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015**

**and**

Anderson Office of Air Management  
P.O. Box 2100  
120 East 8th Street  
Anderson, IN 46011

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the AOAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. **The report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).**
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

~~The documents submitted pursuant to this condition do not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

- (12) Condition D.1.2 - Testing Requirements has been revised to add a rule cite and to read as follows:

**D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

- (13) Condition D.2.1 has been revised as follows:

**D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8]**

Based on the date of construction, pre 1973, there are no Article 8 rules that apply to ~~these facilities~~ **the varnish operations or double drum parts washer.**

**Indiana Department of Environmental Management  
Office of Air Management  
and Anderson Office of Air Management**

**Technical Support Document (TSD) for a Part 70 Operating Permit and  
Enhanced New Source Review (ENSR)**

**Source Background and Description**

**Source Name:** Delphi Energy and Management Systems  
**Source Location:** 2911 State Road 9, Anderson, IN 46016;  
2900 South Scatterfield Road, Anderson, IN 46013  
2902 State Road 9, Anderson, IN 46016;  
2900 State Road 9, Anderson, IN 46016;  
1820 E. 32<sup>nd</sup> Street, Anderson, IN 46016;  
2620 E. 38<sup>th</sup> Street, Anderson, IN 46016.  
**County:** Madison  
**SIC Code:** 3714  
**Operation Permit No.:** T095-6388-00016  
**Permit Reviewer:** J. Patterson

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Delphi Energy and Management Systems relating to the operation of automobile parts manufacturing.

**Source Definition**

This operation of automobile parts manufacturing consists of six (6) plants:

- (1) Plant 11 is located at 2911 State Road 9, Anderson, IN 46016;
- (2) Plant 16 is located at 2900 South Scatterfield Road, Anderson, IN 46013;
- (3) Plant 17 is located at 2902 State Road 9, Anderson, IN 46016;
- (4) Plant 18 is located at 2900 State Road 9, Anderson, IN 46016;
- (5) Plant 19 is located at 1820 E. 32<sup>nd</sup> Street, Anderson, IN 46016; and
- (6) Plant 20 is located at 2620 E. 38<sup>th</sup> Street, Anderson, IN 46016.

Since these six (6) plants are located on contiguous or adjacent properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (1) One (1) natural gas-fired boiler (C), installed in 1973, identified as EU 20-1, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11EA48.
- (2) One (1) natural gas-fired boiler (d), installed in 1973, identified as EU 20-2, rated at 68.9 MMBtu/hr, with no controls, and exhausting to stack CC11NA48.

### **Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR**

The source also consists of the following unpermitted facilities/units:

- (3) Varnish operations consisting of the following:
  - (a) One (1) varnish dip tank, EU 11-18, identified as Dip Tank A (North), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N16EA19, N16NA9 and N18NA19 respectively.
  - (b) One (1) varnish dip tank, EU 11-19, identified as Dip Tank B (South), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks N18EA19, N20EA9 and N18EA19 respectively.
  - (c) One (1) varnish dip tank, EU 11-100, identified as Dip Tank C (East), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18EA25, G20EA7 and G24NA17 respectively.
  - (d) One (1) varnish dip tank, EU 11-101, identified as Dip Tank D (West), with a drying oven and cooling area, with maximum capacity of 600 parts per hour, and exhausting to stacks G18SA25, G20SA8 and G20WA17 respectively.
- (4) One (1) double drum parts washer, identified as EU11-117, with a maximum capacity of 200 pounds per hour, with no controls and exhausting to stack L36EA21.

### **New Emission Units and Pollution Control Equipment Requiring ENSR**

There are no new facilities to be reviewed under the ENSR process.

### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input less than ten million (10,000,000) Btu per hour.
- (2) Equipment powered by internal combustion engines of less than 500,000 Btu per hour capacity, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu per hour. This includes two engine dynamometers that are used for research and development related to various future engine products.
- (3) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage tank of less than 10,500 gallon capacity.
- (4) A petroleum fuel, other than gasoline, dispensing facility, having a storage tank of less than 10,500 gallon capacity, and dispensing less than 230,000 gallons per month.
- (5) Storage tanks less than one thousand (1,000) gallons in capacity with annual throughputs less than twelve thousand (12,000) gallons.
- (6) Vessels storing lubricating oils, hydraulic oils, machining oils and machining fluids.
- (7) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary coatings.
- (8) Machining where an aqueous cutting coolant continuously floods the machine interface.



- (9) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
- (10) Cleaners and solvents characterized as having a vapor pressure of less than 0.7kPa; 5 mmHg or 1 psi measured at 20 degrees C (88 degrees F).
- (11) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment.
- (12) Closed loop heating and cooling systems.
- (13) Rolling oil recovery systems.
- (14) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1%.
- (15) Any operation using aqueous solutions containing less than 1% by weight of VOC's excluding HAPs.
- (16) Forced and induced draft cooling tower system not regulated under a NESHAP.
- (17) Quenching operations used with heat treating processes.
- (18) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (19) Heat exchanger cleaning and repair.
- (20) Trimmers that do not produce fugitive emissions and are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.
- (21) Paved and unpaved roads and parking lots with public access.
- (22) Enclosed systems for conveying plastic raw materials and plastic finished goods.
- (23) Asbestos abatement projects regulated by 326 IAC 14-10.
- (24) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions for those activities would not be associated with any production processes.
- (25) Equipment used to collect any material that might be released during a malfunction, process upset or spill clean up, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.
- (26) Blowdown for any of the following: sight glass; boiler, compressors; pumps and cooling towers.
- (27) Furnaces used for melting metals other than beryllium with a brim full capacity of less than 460 cubic inches by volume.
- (28) On-site fire and emergency response training approved by the department.
- (29) Diesel generators not exceeding 1800 horsepower.
- (30) Stationary fire pumps.

- (31) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying and woodworking operations.
- (32) Filter or coalescer media changeout.
- (33) Mold release agents using low volatile products (vapor pressure less than 2 kilopascals measured at 38 degrees C).
- (34) A laboratory as defined in 326 IAC 2-7-1 (21)(C).
- (35) Rust prevention (Acrylic acid, methyl ethyl ketone).
- (36) Other activities listed below:

Adhesive application	Enamel touch up	Re-op operation
Adhesive, hot melt	Epoxy dispenser	Repair hood
Assembly, black shell	Feeders	Rust inhibitors
Atomized aluminum powder	Filter cooling system	Sanders
Banders	Flux application	Saws, cut-off and band
Battery formation	Foaming station	Sharpeners, drill & hob
Battery test cabinets	Furnaces	Silicone coating
Blander	Glue and ink operations	Spray booth
Blasting, band, sand & steel	Glue degassing	Straightener
Broach machines, gear cutters	Glue dispensers	Sylgard dials
Buffing wheel	Lubricate seals	Test station
Chuckers	Machine aluminum molds	Thermotron units
Cleaning, ink stamp	Machining operations	Trimmer
Cleanup; general	Magnaflux	Urethane mixing station
Coil removal	Magnet assembly	Vacuum furnace
Cold boxes	Mixing station	Varnish dip
Conductive ink	Mixing tanks	Varnish strip
Cure handlers	Molding material silos	Vibration chambers
Cut-out dials, final	Molding presses	Vulcan machine
Date code stamp	Molding, plastic injection	Washer, parts
Dielectric test	Oil/water separator	Washer, rust inhibitor
Dip booth	Ovens, gas and electric	Weigh station
Dip tanks	Oven, hydrogen	Winding machines, wire
Dryer, gas-fired	Oven, thermal shock	Wire brush
Deburring	Oven, vapor-phase	Wire stripping
Electrical discharge machines	Ovens, potting	Wood shop
	Presses, punch	

### Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (1) 1996 Certificate to Operate, Permit Number 0101
- (2) 1996 Certificate to Operate, Permit Number 0311
- (3) 1996 Certificate to Operate, Permit Number 1101
- (4) 1996 Certificate to Operate, Permit Number 1105
- (5) 1996 Certificate to Operate, Permit Number 1106
- (6) 1996 Certificate to Operate, Permit Number 1107
- (7) 1996 Certificate to Operate, Permit Number 1601

- (8) 1996 Certificate to Operate, Permit Number 1603
- (9) 1996 Certificate to Operate, Permit Number 2001
- (10) 1996 Certificate to Operate, Permit Number 2003
- (11) 1996 Certificate to Operate, Permit Number 2004
- (12) 1996 Certificate to Operate, Permit Number 2005
- (13) 1996 Certificate to Operate, Permit Number 2006

All the above permits were issued by the Anderson Office of Air Management.

All conditions from previous approvals were incorporated into this Part 70 permit.

### Enforcement Issue

- (a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete Part 70 permit application for the purposes of this review was received on August 7, 1996. Additional information received on October 9, 1996 makes the Part 70 permit application administratively complete.

A notice of completeness letter was mailed to the source on January 24, 1997.

### Emission Calculations

See Appendix A, one page, of this document for detailed emissions calculations.

### Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO <sub>x</sub>	greater than 100, less than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Acetaldehyde	less than 10
1,3 butadiene	less than 10
Benzene	less than 10
Formaldehyde	less than 10
Glycol Ether	greater than 10
TOTAL	greater than 25

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of VOCs and NO<sub>x</sub> are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 OAM emission data.

Pollutant	Actual Emissions (tons/year)
PM	1.8
PM-10	1.8
SO <sub>2</sub>	0.02
VOC	105.5
CO	0.97
NO <sub>x</sub>	3.9
HAP- Glycol Ether*	38

\*The HAP emissions data is from the Title V application submitted by the source.

### County Attainment Status

The source is located in Madison County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	unclassifiable/attainment
CO	unclassifiable/attainment
Lead	not designated

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Madison County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) The boilers identified as 20-1 and 20-2 are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.4, Subpart Dc), due to their date of construction. Both boilers were constructed prior to 1989.
- (b) This source is not subject to the National Emission Standards for Hazardous Air Pollutants, 40 CFR 63.460 Subpart T because they do not use in the degreaser any solvent containing the following as a cleaning or drying agent:
  - (1) perchloroethylene
  - (2) trichloroethylene
  - (3) 1,1,1-trichloroethane
  - (4) carbon tetrachloride
  - (5) chloroform
  - (6) methylene chloride

### State Rule Applicability - Entire Source

#### 326 IAC 2-2 Prevention of Significant Deterioration

This source is not a major stationary source because emissions of criteria pollutants are less than 250 tons per year and it is not one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of volatile organic compounds. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

#### 326 IAC 6-2-3 (Emission limitations for sources of indirect heating)

The two boilers identified as 20-1 and 20-2, installed in 1973, were existing and in operation before September 21, 1983, therefore, the particulate emissions shall be limited by the following equation:

$$Pt = \frac{C * a * h}{76.5 * Q^{0.75} * N^{0.25}}$$

Where: C = Maximum ground level concentration with respect to distance from the point source at the "critical" wind speed for level terrain. This shall equal 50 micrograms per cubic meter for a period not to exceed a sixty minute time period.

Pt = Pounds of particulate matter emitted per million Btu heat input (lb/mmBtu).

Q = Total source maximum operating capacity rating in mmBtu/hr heat input.  
N = Number of stacks in fuel burning operation.  
a = Plume rise factor which is used to make allowance for less than theoretical plume rise. The value 0.67 shall be used for Q less than or equal to 1,000 mmBtu/hr heat input.  
h = Stack height in feet.

$$Pt = \frac{50 * 0.67 * 100}{76.5 * (40.2) * (1.19)}$$

$$Pt = 0.915 \text{ lbs/mmBtu}$$

The emission rate of 0.915 lb/mmBtu as derived pursuant to 326 IAC 6-2-3(a) is greater than the maximum allowable rate of 0.6 lb/mmBtu pursuant to 326 IAC 6-2-3(e). Therefore, the more stringent limit of 0.6 lb/mmBtu PM emission will apply.

Particulate matter emissions from the boiler are based on an emission factor of 13.7 lbs/MMCF of gas burned. Based on the assumption that 1 MMCF of gas combusted is equivalent to 1000 MMBtu of heat input, the potential emissions from each of the 68.9 MMBtu/hr boilers are expected to be 0.014 lbs/MMBtu. Therefore, the boiler is capable of complying with this rule when combusting natural gas.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

The four varnish dip tanks and the double drum parts washers were constructed prior to January 1, 1980. Therefore, the requirements of 326 IAC 8-2-9, Miscellaneous metal coatings operations, will not apply.

#### 326 IAC 8-6 ( Organic Solvent Emission Limitations )

This source is not subject to 326 IAC 8-6 because it commenced operations prior to October 7, 1974 and it is not located in Lake or Marion counties.

#### 326 IAC 8-3 (Organic Solvent Degreasing Operations)

The degreasing facilities were constructed prior to January 1, 1980 and are located in Madison County. Therefore, 326 IAC 8-3 will not apply.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

### **Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) Since this source has no new construction or reconstruction, 326 IAC 2-1-3.4 New Source Toxics Control, does not apply.

### **Conclusion**

The operation of this automobile parts manufacturing source shall be subject to the conditions of the attached proposed **Part 70 Permit No. T095-6388-00016**.